

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK



UNITED STATES OF AMERICA,

Plaintiff,

-v-

23-MC-1 (JLS)

\$7,306 UNITED STATES CURRENCY, and
ONE 2011 CADILLAC SRX
VIN: 3GYFNFEY2BS616172,

Defendants.

**STIPULATION TO EXTEND PLAINTIFF'S TIME
TO FILE COMPLAINT IN CIVIL FORFEITURE ACTION**

IT IS HEREBY STIPULATED and agreed upon between the parties, the United States of America by its attorney, Trini E. Ross, United States Attorney for the Western District of New York, Mary Clare Kane, Assistant United States Attorney, of counsel, and, Paul G. Dell, Esq., attorney for claimant Kenneth Shoemaker II, that the government's time to file its Verified Complaint for Forfeiture be extended from January 22, 2023 to April 22, 2023, pursuant to Title 18, United States Code, Section 983(a)(3)(A).


The parties to this Stipulation further agree that Kenneth Shoemaker II may revoke his consent in writing to extend the time for the government to file its Verified Complaint for Forfeiture against the above-named property, and in that event, the government shall then have ten (10) days from the date the government received notice of such action to file its

Verified Complaint for Forfeiture.

TRINI E. ROSS
United States Attorney
Western District of New York

Dated: 01/ 13 /2023

BY:


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Dated: 01/ 11 /2023


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